

EXHIBIT

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Declaration of Peter C. Salerno
In Support of Defendant Yassin Kadi's Motion
To Exclude the Testimony of Victor Comras

03 MDL 1570

July 31, 2023



Eidg. Justiz- and
Polizeidepartement

Bundesamt für Polizei

Office fédéral de la police

Département fédéral de
justice et police

Ufficio federale di polizia

Dipartimento federale di
giustizia e polizia

Federal Office of Police

Federal Department of
Justice and Police

Report by
Department

Dominique Ritter
Bundekriminalpolizei [Swiss Federal
Bureau of Investigation], ERM-TWK

Date
File no.
Swiss Federal Public
Prosecutor's Office
Case no.

20/05/05
100 / 254690-705
BA/001/01/000

SWISS FEDERAL PUBLIC PROSECUTOR'S OFFICE				
E	23/...	[illegible]	...	/2005
...	[illegible]	...	01/2006	
Registered				

Final report

regarding funding and logistical support of the criminal organisation Al-Qaeda, led by Osama Bin Laden
Art. 260 *ter*, 260 *quiquies* of the Swiss Criminal Code

for the attention of Claude Nicati, Swiss Federal Public Prosecutor's Office

Defendant

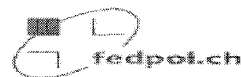
Surname(s)	KADI	m
First name(s)	Yassin Abdullah	
Date of birth	23/02/1955	
a/k/a	Sheikh Yassin Al Qadi and numerous variations	
Birthplace,	Cairo / Egypt	
region/country		
Address, region/country	Saudi Arabia	
Parents	Abdullah Aziz Ud Din Kadi and Salha Omar Zubeir	
Spouse/partner	married to Balgis ¹	
Occupation/employer	Businessman	
Town/country	2141 Jeddah / Saudi Arabia	
Address	Wale Al-Ahad Street, Al-Farsi Center, West Tower 11 th Floor, Suites 1&2 P.O. Box 214	
Languages	Arabic, English	
Personal secretary	Khalid Najl	
Availability	Telephone: 966 2 650 2255 Fax: 966 2 650 2188	
UN Resolution 1267	included on the list of Taliban and Al-Qaeda	

¹ Translator's note: possibly "Belgis" – source text unclear

Regulation dated
Issued to

20/05/05
Claude Nicati,
Swiss Federal Prosecutor's
Department

...[signature]...
Federal Office of Police
Bureau of Investigation
Jacques Repond, Investigating Officer
BUNDESKRIMINALPOLIZEI



5.2 The Muwafaq Foundation in Somalia

The office in Somalia was run from Addis Ababa in Ethiopia. The Muwafaq Foundation was never officially registered. Nevertheless it operated in Somalia from December 1992. The Regional Director was a Somali called Sohaib Abdul Lateef Sheikh BASHIR, who had lived in Saudi Arabia for many years. The Muwafaq carried out various aid projects in various regions in Somalia. At the end of 1996 the charity was closed and all the operations were assigned to the "Zam Zam Foundation" in Somalia.

See YAK to OFAC, index to statement of Yassin Abdullah KADI, pages 60 - 62

5.3 The Muwafaq Foundation in Uganda

The Foundation was also active in Uganda. No details about this location are available however.

See YAK to OFAC, index to statement of Yassin Abdullah KADI, page 16

5.4 Other Muwafaq Foundation locations in Africa, which have been mentioned in the press

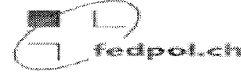
The Muwafaq Foundation reportedly never operated in Eritrea, Chad or Tanzania. Although Muwafaq applied for approval from the authorities in Kenya, in the end the Foundation never worked in Kenya either. Nevertheless occasional reports can be read in the international press about Muwafaq Foundations in these countries.

See YAK to OFAC, index to statement of Yassin Abdullah KADI, pages 16 - 17

6. The Muwafaq Foundation in Pakistan, responsible for Asia

6.1 The Regional Director Amir MEHDI

The Regional Director of the Muwafaq Foundation in Pakistan was Mr. Amir MEHDI Saleh, a Pakistani national. His brother, Saleh Hassan MEHDI, who had once lived in Jeddah / SA and was a lecturer at King Abdul Aziz University, had recommended Amir to Mr. KADI. Amir MEHDI had excellent local knowledge, because he had worked as a teacher in Peshawar and Islamabad. This was why he was appointed by Mr. KADI.



See response of Yassin Abdullah KADI to the questionnaire of the Deputy Attorney-General of Switzerland, question, response nos. 95 and 96, from 12/03/04

See Yassin Abdullah KADI and OFAC, index to statement, page 27

Amir MEHDI is suspected to be a leading member of the Pakistani terrorist organisation Harkatul Mujahideen. On 03/10/2001 this organisation was placed on the Taliban and Al-Qaeda list compiled under UN Resolution 1267. Harkatul Mujahideen has worked very closely with Osama BIN LADEN's Al-Qaeda in the past and according to various sources also used the Al-Qaeda training camps in Afghanistan. Yassin Abdullah KADI worked on a personal level with Mr. Amir MEHDI. In the photo-dossier you will find Mr. KADI, Mr. JULAIDAN and Mr. MEHDI pictured at a meeting together. John Walker Lindh, the American Taliban, after his time at ZINDANI's Al-Eman University in the Yemen also went first to a Harkatul Mujahideen training camp in Pakistan, before joining the Taliban and Al-Qaeda in Afghanistan.

See photo-dossier, photographs 228 & 261

See article in The Tribune, Pak Muslim leaders flay attacks, Islamabad, from 7/10/01

See article on rediff.com, Pak-based militant groups reject talks offer, from 2/04/01

See article on Islam online, Pakistani Muslim Leader detained by intelligence, from 10/07/01

See article in Gulf News, Militants unfazed by fund freeze, from 26/09/01

See article in Terrorist Group Profiles, The Harakat ul-Mujahidin (HUM)

See USA v. John Philip Walker Lindh, Affidavit in Support of a Criminal Complaint and an Arrest Warrant, Criminal Number 02-51-M

Mr. Yassin KADI also sent considerable sums of money to Amir MEHDI of the Muwafaq Foundation via his company Leemount.

Date	Amount	Account		Muwafaq / Amir MEHDI
15/06/94	US\$ 200'000.-	Leemount, acct. no. 10172	to	Emirates Bank International, Peshawar, acct. no. 702228

According to the Statement of Affairs at 31/12/1992, the Muwafaq Foundation also granted its Director a loan/advance payment.

Date	Amount	Muwafaq Pakistan		Amir MEHDI
1992	US\$ 3589.-	Loan/advance payment	to	Loan/advance payment